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March 21, 2025

**VIA ECF**

Hon. Mary Kay Vyskocil, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**RE: Request for Extension of Time for an Application to Restore Action  
*Trs. of the N.Y.C. District Council of Carpenters, et al. v. John Knopf  
Flooring, Inc. and AJ Demolition LLC, Case No. 24 CV 4349 (MKV)***

Dear Judge Vyskocil,

This firm represents the Plaintiffs (the “Funds”) in the above-referenced case. We write jointly with Defendants, in accordance with the Court’s Individual Rules of Practice, § 2(G), to request a thirty (30) day extension of time for the parties to make an application to restore this action, through April 23, 2025. This is the first request by either party for an extension of time to make an application to restore this action.

On February 20, 2025, this Court so-ordered an order of dismissal and stated:

Accordingly, IT IS HEREBY ORDERED that the upcoming Post Discovery Conference scheduled for February 25, 2025 is ADJOURNED sine die and the above captioned action is discontinued without costs to any party and without prejudice to restoring the action to this Court’s calendar if the parties are unable to memorialize their settlement in writing and as long as the application to restore the action is made by March 24, 2025.

ECF Doc. No. 25. Currently, the parties are addressing certain details regarding settlement compliance; certain written instruments must still be finalized and executed in order for the agreement to become effective. Accordingly, the parties respectfully request a thirty (30) day extension of time to be able to make an application to restore the action while they come to a resolution.



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We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/Maura Moosnick  
Maura Moosnick, Esq.

Cc: Richard Ziskin, Esq. (via ECF)

**Granted. SO ORDERED.**

Date: 3/21/2025  
New York, New York

Mary Kay Vyskocil  
Mary Kay Vyskocil  
United States District Judge